

**MEMO ENDORSED**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

TRAVELEX CURRENCY SERVICES, INC.,

Plaintiff,

v.

PUENTE ENTERPRISES, INC.,

Defendant.

PUENTE ENTERPRISES, INC.,

Counterclaim Plaintiff,

v.

TRAVELEX CURRENCY SERVICES, INC.,

Counterclaim Defendant.

PUENTE ENTERPRISES, INC.,

Third-Party Plaintiff,

v.

JAMES C. HEWITT, JR.,

Third-Party Defendant.

**DEFENDANT, COUNTERCLAIMANT, AND THIRD PARTY PLAINTIFF PUENTE ENTERPRISES, INC.'S NOTICE OF MOTION TO FILE UNDER SEAL LETTER AND EXHIBITS IN SUPPORT OF PEI'S LETTER MOTION**

To: McKool Smith, P.C.,  
One Manhattan West,  
395 9th Avenue, 50th Floor,  
New York, New York, USA 10001

PLEASE TAKE NOTICE that Defendant, Counterclaimant, and Third Party Plaintiff, Puente Enterprises, Inc. ("PEI") will move this Court, before the Honorable Edgardo Ramos, in

the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, 10007, on a date and at a time to be designated by the Court, for an Order granting PEI's Motion to File under Seal Letter and Exhibits in Support of PEI's Letter Motion and permitting PEI to file certain documents under seal.

**MOTION**

PEI respectfully seeks an Order to file under seal its letter and exhibits submitted in support of PEI's letter motion dated July 5, 2020. As set forth in PEI's accompanying Declaration the bases for this Motion are as follows:

1. Pursuant to the Court's June 30, 2020 directive during the parties' conference call, PEI filed a sealed letter with exhibits briefing the issues raised during the conference call regarding relevancy of certain discovery.
2. The information in the letter and exhibits proposed to be filed under seal contains testimony which counsel for Travelex marked confidential, as well as documents marked confidential pursuant to the discovery confidentiality order entered in this case. *See* ECF No. 44.
3. At Travelex's request, PEI has filed its letter and exhibits marked confidential under seal.

For the foregoing reasons, PEI respectfully request that the Court enter the proposed Order filed herewith authorizing the filing of certain exhibits and letter under seal.

Date: July 5, 2020

KAUFMAN DOLOWICH & VOLUCK, LLP

By: /s/ Christopher Nucifora  
Christopher Nucifora  
Erik Sardiña  
Telephone: (201) 708-8207  
Facsimile: (201) 488-6652

25 Main Street, Ste. 500

Hackensack, New Jersey 07601

-or-

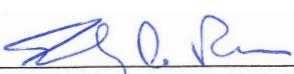
40 Exchange Place, 20<sup>th</sup> Floor  
New York, New York 10005

*Attorneys for Defendant, Counterclaim  
Plaintiff, and Third-Party Plaintiff  
Puente Enterprises, Inc.*

The motion to seal Docs. 103 and 108 is GRANTED.. The motion to extend discovery by 30 days contained in Doc. 108 is likewise GRANTED. The case management conference currently scheduled for September 3 is adjourned to October 9 at 10:30 a.m.

The plaintiff is directed to respond to the issues raised in Doc. 108 by Friday, July 10. The plaintiff may submit that response under seal.

SO ORDERED.

  
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Edgardo Ramos, U.S.D.J  
Dated: Jul. 07, 2020  
New York, New York